

## **Exhibit 2**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUNICULAR FUNDS, LP, individually and on behalf of all others similarly situated,

Plaintiff,

v.

PIONEER MERGER CORP., PIONEER MERGER SPONSOR LLC, JONATHAN CHRISTODORO, RICK GERSON, OSCAR SALAZAR, RYAN KHOURY, SCOTT CARPENTER, MATTHEW COREY, MITCHELL CAPLAN, and TODD DAVIS,

Defendants.

Civil Action No. 22-10986-JSR

**SUMMARY NOTICE OF (I) PROPOSED CLASS ACTION  
SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING; AND  
(III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All persons or entities who owned Class A common stock of Pioneer Merger Corp. (in Official Liquidation) ("Pioneer") as of January 13, 2023 and the shares were redeemed (the "Class").<sup>1</sup>

**PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED  
BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.**

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York (the "Court"), that the above-captioned securities class action (the "Action") is pending in the Court.

YOU ARE ALSO NOTIFIED that Lead Plaintiff Funicular Funds, LP, on behalf of itself and the Class, has reached a proposed settlement of the Action for \$13,000,000 in cash and a contingent payment of 80% of any proceeds paid pursuant to an insurance policy covering certain defendants, as further described in the full Notice (the "Settlement"), which has been distributed to the Class and is available at [www.pioneermergercorpsettlement.com](http://www.pioneermergercorpsettlement.com). If approved, the Settlement will resolve all claims in the Action.

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<sup>1</sup> Certain persons and entities are excluded from the Class, as set forth in the full Notice, which is available at [www.pioneermergercorpsettlement.com](http://www.pioneermergercorpsettlement.com). Terms not defined herein are defined by the full Notice.

A hearing will be held on [ ], 2023, at [ : ] [ ].m., before the Honorable Jed S. Rakoff, either in person at the United States District Court for the Southern District of New York, Courtroom 14B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or by telephone or videoconference (in the discretion of the Court), to determine, among other things: (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the releases specified and described in the Stipulation and Agreement of Settlement dated as of February \_\_, 2024 (and in the Notice) should be granted; and (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; (iv) whether Lead Counsel's motion for an award of attorneys' fees, incentive award and litigation expenses should be approved; and (v) any other matters that may properly be brought before the Court in connection with the Settlement.

If you are a member of the Class, your rights may be affected by the pending Action and the Settlement. More information can be found at [www.pioneermergercorpsettlement.com](http://www.pioneermergercorpsettlement.com).

If you are a member of the Class, you have the right to object to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees, incentive award and litigation expenses. Any objections must be filed with the Court and delivered to counsel specified in the Notice such that they are received no later than \_\_\_, 2024, in accordance with the instructions set forth in the Notice.

**Please do not contact the Court, the Office of the Clerk of the Court, Defendants, or Defendants' Counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility for the Settlement should be directed to Lead Counsel for the Class.**

All inquiries should be directed to Lead Counsel for the Class:

**Morris Kandinov LLP**  
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By Order of the Court